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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91231148
Party	Defendant Apple Inc.
Correspondence Address	Glenn A. Gundersen Dechert LLP Cira Centre2929 Arch Street Philadelphia, PA 19104-2808 UNITED STATES daniel.hope@dechert.com, glenn.gundersen@dechert.com, trade- marks@dechert.com
Submission	Answer
Filer's Name	Daniel P. Hope
Filer's e-mail	daniel.hope@dechert.com, glenn.gundersen@dechert.com, gayle.denman@dechert.com, trademarks@dechert.com
Signature	/Daniel P. Hope/
Date	01/19/2017
Attachments	PINGFANG SN 86836192 Karsten Manufacturing v Apple Opposition 91231148 Answer Jan 19 2017.pdf(8791 bytes)

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

Application Serial No. 86/836,192

Mark: PINGFANG

Published in the *Official Gazette* on May 17, 2016

KARSTEN MANUFACTURING
CORPORATION

Opposer,

V.

APPLE INC.

Applicant.

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Opposition No. 91231148

ANSWER

Applicant Apple Inc. (“Apple”), by its attorneys, hereby answers the numbered paragraphs of the Notice of Opposition filed by Karsten Manufacturing Corporation (“Opposer”) as follows:

1. Apple is without knowledge or information sufficient to form a belief as to the truth of the allegations in the first numbered paragraph, and they are therefore denied.
2. Apple is without knowledge or information sufficient to form a belief as to the truth of the allegations in the second numbered paragraph, and they are therefore denied.
3. Apple is without knowledge or information sufficient to form a belief as to the truth of the allegations in the third numbered paragraph, and they are therefore denied. To the extent the allegations set forth in the third numbered paragraph are legal conclusions, to which no response is required, Apple denies the allegations.
4. Apple is without knowledge or information sufficient to form a belief as to the truth of the allegations in the fourth numbered paragraph, and they are therefore denied. Apple

states that the records of the United States Patent and Trademark Office (“PTO”) identify Opposer as the current owner of record of each of the registrations listed in the fourth numbered paragraph, except for Registration No.3505200, and leaves Opposer to the proof thereof. Apple refers Opposer to the PTO records for a complete and accurate statement of the details pertaining to the registrations identified in the fourth numbered paragraph.

5. The allegations in the fifth numbered paragraph are legal conclusions, to which no response is required. To the extent a response is required, the allegations in the fifth numbered paragraph are denied.

6. The allegations in the sixth numbered paragraph are legal conclusions, to which no response is required. To the extent a response is required, the allegations in the sixth numbered paragraph are denied.

7. Apple is without knowledge or information sufficient to form a belief as to the truth of the allegations in the seventh numbered paragraph, and they are therefore denied. To the extent the allegations set forth in the seventh numbered paragraph are legal conclusions, to which no response is required, Apple denies the allegations.

8. The allegations in the eighth numbered paragraph are legal conclusions, to which no response is required. To the extent a response is required, the allegations in the eighth numbered paragraph are denied.

9. Apple admits the allegations in the ninth numbered paragraph.

10. The allegations in the tenth numbered paragraph are legal conclusions, to which no response is required. To the extent a response is required, the allegations in the tenth numbered paragraph are denied.

11. Apple denies the allegations in the eleventh numbered paragraph. To the extent the allegations set forth in the eleventh numbered paragraph are legal conclusions, to which no response is required, Apple denies the allegations.

12. Apple denies the allegations in the twelfth numbered paragraph. To the extent the allegations set forth in the twelfth numbered paragraph are legal conclusions, to which no response is required, Apple denies the allegations.

13. The allegations in the thirteenth numbered paragraph are legal conclusions, to which no response is required. To the extent a response is required, the allegations in the thirteenth numbered paragraph are denied.

14. The allegations in the fourteenth numbered paragraph are legal conclusions, to which no response is required. To the extent a response is required, the allegations in the fourteenth numbered paragraph are denied.

15. The allegations in the fifteenth numbered paragraph are legal conclusions, to which no response is required. To the extent a response is required, the allegations in the fifteenth numbered paragraph are denied.

16. The allegations in the sixteenth numbered paragraph are legal conclusions, to which no response is required. To the extent a response is required, the allegations in the sixteenth numbered paragraph are denied.

WHEREFORE, Apple prays that this Opposition be dismissed with prejudice and the registration of the mark shown in Application Serial No. 86/836,192 be granted.

Date: January 19, 2017

Respectfully submitted,

/Daniel P. Hope /
Glenn A. Gundersen
Daniel P. Hope
Dechert LLP
Cira Centre
2929 Arch Street
Philadelphia, PA 19104-2808

*Counsel for Applicant
Apple Inc.*

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Answer has been duly served by email to counsel for Opposer, John D. Titus at JTitus@HartmanTitus.com, pursuant to Trademark Rule 2.119 (amended, effective January 14, 2017), and by first class mail to Opposer's counsel at Hartman Titus PLC, 7114 E. Stetson Drive, Suite 205, Scottsdale, AZ 85251, on January 19, 2017.

/Daniel P. Hope/
Daniel P. Hope